

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	No. 08 CR 0122
v.)	Hon. Amy St. Eve
)	
KEVIN WADDELL)	

MOTION TO MODIFY CONDITIONS OF RELEASE

Kevin Waddell, defendant herein, by his attorney, Gary Ravitz, respectfully moves to modify the conditions of pretrial release, and, in support of this motion, states the following:

1. Mr. Waddell has complied with all conditions of the pretrial release order, which currently includes a condition of home incarceration.

2. Mr. Waddell moves to modify the release order by substituting a condition of home confinement in lieu of home incarceration.

3. The undersigned attorney has personally conferred with Pretrial Services Officer Victor Alvarez, who has been monitoring Mr. Waddell's adjustment to pretrial release. Mr. Alvarez does not oppose the proposed modification of the release order to replace home incarceration with home confinement.

WHEREFORE, Kevin Waddell moves to modify his pretrial release order as requested.

Respectfully submitted,

s/ Gary Ravitz

Gary Ravitz, attorney for Kevin Waddell

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